



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ROMAN BIBERMAN,

Plaintiff,

-against-

CITIGROUP, INC.,

Defendant.
-----X

Civ. Action No.:
1:18-cv-4046 (GBD)

**~~FILED~~ CIVIL CASE
MANAGEMENT PLAN AND
SCHEDULING ORDER**

After consultation with counsel for the parties, the following Case Management Plan is adopted. This plan is also a scheduling order pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure.

1. An initial pretrial conference will be held on Tuesday, July 31, 2018 at 9:30 a.m. at the United States District Courthouse, 500 Pearl Street, New York, New York, Courtroom 11A.
2. No additional parties may be joined after November 6, 2018.
3. No amendment to the pleadings will be permitted after November 6, 2018.
4. Except for good cause shown, all fact discovery shall be commenced in time to be completed by January 30, 2019. The court expects discovery to be completed within 90 days of the first scheduling conference unless, after the expiration of that 90 days period, all counsel stipulate that additional time (not to exceed 60 more days) is needed to complete discovery. In such event, discovery may be extended by the parties on consent without application to the Court, provided the parties are certain they can still meet the discovery completion date ordered by the Court. The discovery completion date shall not be adjourned except upon a showing of extraordinary circumstances.
5. Dispositive motions are to be served by March 15, 2019. Answering papers are to be served by April 30, 2019. Reply papers are to be served by May 30, 2019. In the event a dispositive motion is made, the date for submitting the Joint Pretrial Order shall be changed from that shown herein to four (4) weeks from the decision on the motion. The final pretrial conference shall be adjourned to a date five (5) weeks from the decision on the motion.
6. A final pretrial conference will be held on _____, 2019 at 9:45 a.m.

7. The Joint Pretrial Order shall be filed no later than fifteen (15) days after the close of expert discovery, or thirty (30) days after the decision on a motion for summary judgment if there is no expert discovery. The requirements for the pretrial order and other pretrial submissions shall be governed by the Court's Individual Rules of Practice.
8. All motions and applications shall be governed by the Court's Individual Rules of Practice.
9. The parties shall be ready for trial within 48 hours, notice on or after _____, 2019. The estimated trial time is four (4) days, and this is a jury trial.
10. A Subsequent Case Management Conference will be held on December 4, 2018, at 9:45 a.m.

Dated: July 31, 2019
New York, New York

JUL 25 2018

SO ORDERED:

George B. Daniels
George B. Daniels
United States District Judge

ANTOLLINO, PLLC
275 Seventh Avenue, Suite 705
New York, New York 10001
(212) 334-7397

By: Greg S. Antollino
Gregory Antollino

ATTORNEYS FOR PLAINTIFF

Dated: July ___, 2018

JACKSON LEWIS P.C.
666 Third Avenue, 29th Floor
New York, New York 10017
(212) 545-4000

By: Dana G. Weisbrod
Dana G. Weisbrod
Arielle V. Garcia

ATTORNEYS FOR DEFENDANT

Dated: July ___, 2018